

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date: April XX, 2017

Region: Mooresville Regional Office
County: Catawba
NC Facility ID: 1800107
Inspector's Name: Jennifer Womick
Date of Last Inspection: 08/30/2016
Compliance Code: 3 / Compliance - inspection

| <p align="center">Facility Data</p> <p>Applicant (Facility's Name): Hickory Springs Manufacturing - Conover Complex</p> <p>Facility Address: Hickory Springs Manufacturing - Conover Complex 1101 Farrington Street Conover, NC 28613</p> <p>SIC: 3086 / Plastics Foam Products NAICS: 326150 / Urethane and Other Foam Product Manufacturing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p> | | | | <p align="center">Permit Applicability (this application only)</p> <p>SIP: N/A NSPS: N/A NESHAP: N/A PSD: N/A PSD Avoidance: N/A NC Toxics: N/A 112(r): N/A Other: N/A</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|---|--------|--|---------------------------|--------------------------|---|--|---|---|-----|----|------|-----------|-------------|------|--------|--------|--------|--------|--------|--------|---------------------------------------|------|--------|--------|--------|--------|--------|--------|---------------------------------------|------|--------|--------|--------|--------|--------|--------|---------------------------------------|------|--------|--------|--------|--------|--------|--------|---------------------------------------|------|--------|--------|--------|--------|--------|--------|---------------------------------------|
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| Review Engineer: Lori Ann Phillips Review Engineer's Signature: Date: | Comments / Recommendations: Issue 04271/T24 Permit Issue Date: April XX, 2017 Permit Expiration Date: March 31, 2022 |
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1. Purpose of Application:

Hickory Springs Manufacturing – Conover Complex has submitted a Title V permit renewal application, 1800107.16B, for their facility located at 1101 Farrington Street in Conover, Catawba County. The complete application was received at the RCO on October 5, 2016. Hickory Springs Manufacturing is currently operating under Air Quality Permit No. 04271T22 which expires on June 30, 2017.

2. Facility Description:

Hickory Springs Manufacturing – Conover Complex operates a manufacturing facility that includes the following processes: flexible polyurethane foam production and fabrication, polyethylene foam extrusion and wire drawing operations. Recent permit modification, T23, removed the flexible polyurethane foam production and fabrication processes from the permit.

3. Application Chronology:

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|--------------------|--|
| September 30, 2016 | Renewal application received at Mooresville Regional Office. |
| October 5, 2016 | Renewal application received at Raleigh Central Office. Application package include all necessary forms and authorized signature. |
| October 5, 2016 | Sent acknowledgement letter to Michael Simmons, President, indicating that the application is complete. |
| February 2, 2017 | Gautam Patnaik issued minor permit modification, T23. |
| February 9, 2017 | Sent copies of the draft permit and permit review to the facility and regional office for their review. |
| February 10, 2017 | Received minor comments on the draft permit from Jennifer Womick, Mooresville Regional Office. |
| February 27, 2017 | Received minor comments from Charles Armstrong, Plant Manager, of Hickory Springs. |

4. New Equipment/Changes in Emissions and Regulatory Review:

New or Modified Equipment: There are no changes in equipment associated with this renewal application. The facility recently submitted a minor modification application, 1800107.16A, and was issued permit 04271T23, which removed all emission sources associated with the foam

pouring operations from the permit. A different company, Elite Comfort Solutions, is now operating the foam pouring operations on the adjacent property.

Change in Emissions: There are no changes in emissions associated with this renewal application.

Regulatory Review: There are no changes in regulations associated with this permit renewal.

5. Changes to Permit:

- Updated all dates and permit revision numbers.
- Renumbered the permit sections to account for the sections removed in the T23 minor permit modification.
- Added a leading “0” to all of the NC regulatory citations to maintain consistent nomenclature.

6. NSPS, NESHAPS, MACT, PSD, and Attainment Status:

This facility is not subject to any NSPS requirements and is a PSD minor source located in Catawba County, which is in attainment for all criteria pollutants.

Previous sources at this facility had been subject to the Flexible Polyurethane Foam Production and Fabrication NESHAP (Subpart OOOOOO); however, they are no longer owned and operated by Hickory Springs Manufacturing and have been removed from the permit. In the T23 minor permit modification prepared by Gautam Patnaik of the RCO and issued on February 2, 2017, a new insignificant source, I-glue, was added to the Insignificant Activities List. I-glue consists of three hot melt glue machines that melt down packets of glue and then apply a layer of melted adhesive to the inside of foam pipe insulation with a removable strip. In the T23 review, comments from the facility indicated that the hot melt glue machines were subject to Subpart OOOOO.

7. Facility Wide Air Toxics:

This permit renewal does not trigger an air toxics review.

8. Compliance Status:

The facility was in compliance during the most recent inspection conducted on August 30, 2016 by Jennifer Womick.

9. Other Considerations:

- A P.E. seal is NOT required for this application.
- A zoning consistency determination is NOT required for this application.
- This facility is subject to the 112(r) program. The following except describing the 112(r) program at Hickory Springs was copied from the T23 permit review document. ‘As per the Regional Office “they are a program level 1 in the Foam Plant for TDI and a program level 3 in the PTI Division for isobutane. An inspection was conducted by Jim Westmorland of this Office on October 26, 2010. The facility had all of the required records and appeared to be in compliance with the 112(r) program at that time. Elite Comfort Solutions now owns and operates the sources in the foam plant, but Hickory

Springs Manufacturing will still be responsible for maintaining compliance with the isobutane in the PTI division.””

11. Public Notice Review:

A 30-day public notice and 45-day EPA review period is required for this permit renewal.

The 30-day public notice period was from XX through XX.

The EPA 45-day review period was from XX through XX.

12. Conclusions, Comments, and Recommendations:

This air permit renewal application for Hickory Springs Manufacturing – Conover Complex, located at 1101 Farrington Street in Conover, Catawba County, has been reviewed by DAQ to determine compliance with all procedures and requirements. The Mooresville Regional Office has made comments on the draft permit. Continued compliance with this air permit is expected. Recommend issuance of revised air permit No. 04271T24.